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Attorneys for Defendants Chicago Title  
Insurance Company  
Federal Bar No.: DF-2294

DARE INVESTMENTS, LLC, a Utah limited  
liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE COMPANY, a  
Missouri domiciled insurer; HORIZON TITLE  
AGENCY, Inc., a New Jersey domiciled company;  
CHICAGO TITLE RICO ENTERPRISE, a  
racketeering enterprise,

Defendants.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Case Action No.2:10-CV-06088(DRD)(MAS)

**CERTIFICATION OF DERRICK R.  
FREIJOMIL, ESQ. IN SUPPORT OF  
CHICAGO TITLE INSURANCE  
COMPANY MOTION FOR REVOCATION  
OF PRO HAC VICE ADMISSIONS AND  
DISQUALIFICATION OF COUNSEL**

**MOTION RETURN DATE:  
JANUARY 17, 2012**

I, DERRICK R. FREIJOMIL, hereby certify as follows:

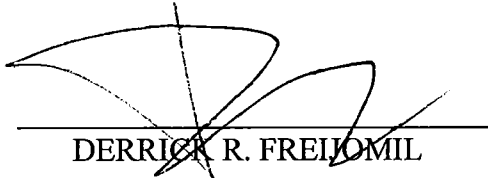
1. I am an attorney-at-law admitted to practice in the United States District Court for the District of New Jersey and am a counsel of the law firm of Riker, Danzig, Scherer, Hyland & Perretti LLP, attorneys for Chicago Title Insurance Company ("Chicago Title") in the above-referenced matter. As such, I am fully familiar with the facts stated herein based upon personal knowledge. I make this certification in support of Chicago Title's Reply Brief in Further Support of its Motion for Revocation of Pro Hac Vice Admissions and Disqualification of Counsel.

2. During conversations with Peter Strojnik ("Strojnik Sr.") in this matter, he asked myself (and other attorneys at this firm's offices) to refrain from deposing

witnesses in this litigation during the month of December 2011. Strojnik Sr. informed that this request was because his wife had asked him to take off that entire month. Strojnik Sr. did not inform me that he needed to take off for the month of December 2011 because wife had a medical condition or was undergoing treatment during that month or because he was being suspended from the practice of law for thirty days. It was based on this information that I included in my October 26, 2011 letter to Strojnik Sr. (which is attached as Ex. 13 to the December 21, 2001 Certification of Michael R. O'Donnell, Esq. filed in this matter) the reference to accommodating Strojnik Sr.'s "vacation schedule" and "request to avoid scheduling depositions during the month of December."

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: January 10, 2012



DERRICK R. FREILOMIL